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SEP - 8 2020

NPDES Form ISW-GP Corrective Actions Report

NDEQ ISW-GP, Attachment 4

NE Dept of Environment and Energy  
DEE158

Form Approved  
2016

Nebraska Department of Environmental Quality  
Corrective Actions Report for NPDES General Permit for Storm Water  
Discharges Associated with Industrial Activity  
(NPDES Permit No. NER910000)



A. General Information

1. Facility Name: Alten, LLC
2. NPDES Permit Tracking Number: NER 910444
3. Location Address:
- a. Street: 1344 Co. Rd. 10
- b. City: Mead c. County: Saunders
- d. State: NE e. zip code: 68041

B. Corrective Actions Section 1 (complete this section for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews)

1. Corrective Action # 1 of 1 for this report

2. Is this corrective action:

- ☒ An update on a corrective action from a previous corrective action report?
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☒ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (please describe):

4. Briefly describe the nature of the problem identified:

NDEE has requested a wording change within our SWPPP.

5. Date problem identified: 6/2/2020

6. How was the problem identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☒ Notification by EPA, State, or local authorities
- ☐ Other (please describe):



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**B. Corrective Actions Section 2** (complete this section for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews)

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

See attachment

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 06/12/2020

10. Date corrective action completed: 08/28/2020 or expected to be completed: 1/1

11. If corrective action not yet completed, provide the status of corrective action at the time of this submission and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

**C. Report Certification**

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

(This report may be signed by the SWPPP Contact/Authorized Representative, it does not require the signature of the facility Certifying Official, though the Certifying Official Signature is also acceptable)

1.a. Print Name: Scott Tingelhoff

b. Title: General Manager

c. Signature: [Signature]

d. Date: 08/28/2020 (MM/DD/YYYY)

e. The signatory on this form is the facility: ☐ Authorized Representative ☒ Certifying Official

### Wet Cake Loadout and Storage Areas

AltEn produces wet cake as a co-product of the ethanol manufacturing process. Specifically, the facility produces wet distillers' grain (wet cake or WDG) which has about a 70% moisture content and trace amounts of corn oil. When using regular corn, the WDG can be sold as cattle feed. Otherwise, when using treated seed corn, the WDG can be handled in various ways. The WDG can be composted and then land applied on nearby farm fields. Another option is to use the WDG as feedstock in the anaerobic digesters and/or the biochar gasifier unit. AltEn can also elect to ship wet cake to a local landfill for disposal. AltEn is constantly looking for other beneficial uses of the WDG.

Wet cake is the solid material coming from the centrifuges and is conveyed to and is initially stored on a covered concrete pad. It is then loaded into trucks for transport to the digesters or sent to the adjacent feed lot as cattle feed. When using treated seed corn as a feedstock to the ethanol process, the WDG can contain trace amounts of residual pesticides. To prevent any storm water that has contacted WDG from leaving the property, AltEn uses natural topography and has built and maintains earthen berms around these holding areas where necessary to contain any runoff from the WDG. This is the primary control measure implemented to contain any runoff and they prevent storm water that has been in contact with WDG from leaving the area and site.

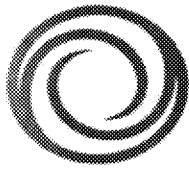
Part 2.1 of General Permit No. NER910000 requires facilities to implement control measures to manage runoff and eliminate non-storm water discharges not authorized by the general permit. To comply with those requirements, existing topography, location of berms and lagoon dikes, and site grading established and maintained by AltEn within the wet cake storage areas diverts any storm water that falls within those areas to the southeast, where it collects in a water holding area north of the tank farm. Please refer to Appendix J for a diagram showing the wet cake storage areas drainage patterns and current locations of berms.

If AltEn becomes aware that a berm was compromised, it will be repaired immediately. AltEn has implemented routine inspections of the berms to respond to any concerns and find any deficiencies so they can be corrected to prevent unauthorized discharges. If any deficiencies are found, the facility will make whatever repairs are necessary and prepare and submit a Corrective Action report as required by Part 3.1 of the general permit.

AltEn understands that any unauthorized discharge of storm water co-mingled with non-storm water is considered a violation of the General Permit.

The primary bermed wet cake areas are north and east of the two seed corn storage warehouses. A secondary bermed wet cake area has been constructed approximately one-half mile east of the facility, on land owned by AltEn, west of County Road 9.

Wet cake may occasionally spill onto the road during material transfer from the covered concrete pad into a truck. Any wet cake that accumulates outside of the concrete pad or bermed areas will be cleaned up as soon as possible to prevent sediment loading to storm water. AltEn personnel monitor the transfer activities and have hand tools available to cleanup wet cake outside the storage area. If necessary, AltEn also has a front-end payloador or a sweeper to remove any spilled WDG from the haul roads.



**AltEn, LLC**  
1344 County Road 10  
Mead, NE 68041

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August 31, 2020

SEP - 8 2020

Mark Pomajzl  
NDEE Water Quality Division  
1200 N Street, Suite 400  
P.O. Box 98922  
Lincoln, NE 68509-8922

NE Dept of Environment and Energy  
By: \_\_\_\_\_ DEE158 \_\_\_\_\_

**Re: Response to Notice of Violation**  
**NDEQ ID: 84069**  
**Program ID: NER910444**

Dear Mr. Pomajzl:

AltEn, LLC has updated our SWPPP documenting how unpermitted discharges from wet cake containing pesticides are being addressed as referenced in Violation A.1.a in the Notice of Violation (NOV) of Title 119 – Rules and Regulations Pursuant to the Issuance of Permits under the National Pollutant Elimination System (NPDES) by the Nebraska Department of Environment and Energy based on an inspection conducted April 3, 2020. Please see the Corrective Action attached.

If any additional documentation is needed, please do not hesitate to contact me at 402-624-0900 or [stingelhoff@mrgkc.com](mailto:stingelhoff@mrgkc.com).

Sincerely,

Scott Tingelhoff  
General Manager